

FEB 11 2025

US DISTRICT COURT  
WESTERN DISTRICT OF NC

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
Charlotte Division

OMAR DUPRAZ CRITTINGTON

Plaintiff,

COMPLAINT

vs.

Case No. 3:25-cv-104-MR

GARRY L. MCFADDEN, JONES, BLACK

BOMASH, JOHNSON, GRADY

MORE, FORD, ICE, INGRAVE

HASSAN

Defendant(s).

A. JURISDICTION

Jurisdiction is proper in this court according to:

42 U.S.C. §1983

42 U.S.C. §1985

Other (Please specify)

B. PARTIES

1. Name of Plaintiff:  
Address:

Omar D. Crittington  
P.O. Box 31367  
Charlotte N.C. 28234

2. Name of Defendant:  
Address:

Garry L. McFadden  
Mecklenburg County Sheriff's Office  
700 East Fourth St.  
Charlotte N.C. 28202

Is employed as

Sheriff  
(Position/Title)

at

MSCO  
(Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred? YES ☒ NO ☐ if "YES" briefly explain:

He is the Sheriff of the Mecklenburg County  
Sheriff's Office (MCSO).  
In his Official Capacity

3. Name of Defendant: Nurse Jones  
Address: 700 East Fourth St  
Charlotte, N.C. 28202

Is employed as Nurse at MCSO  
(Position/Title) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred? YES ☒ NO ☐ if "YES" briefly explain:

She is one of the sick call nurse's.  
In her individual capacity

4. Name of Defendant: Nurse Black  
Address: 700 East Fourth St.  
Charlotte, N.C. 28202

Is employed as Nurse at MCSO  
(Position/Title) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred? YES ☒ NO ☐ if "YES" briefly explain:

He is one of the sick call nurse's.  
In his individual capacity

(Use additional sheets if necessary.)

#### C. NATURE OF CASE

Why are you bringing this case to court? Please explain the circumstances that led to the problem.

As a pretrial detainee I have a 4th, 5th, 8th and  
14th Amendment right to medical care, To be  
secure in my persons, papers and private property.  
Most of all to have equal protection of the law.



## B. PARTIES

5. Name of Defendant: Dr. Romash  
Address: 700 East Fourth St.  
Charlotte, N.C. 28202

Is employed as a Doctor at MCSO

YES! the defendant was acting under the Authority  
of color of the state law at the time.  
Dr. Romash is one of the providers at the Jail  
In her individual capacity.

6. Name of Defendant: Nurse Grady  
Address: 700 East Fourth St.  
Charlotte, N.C. 28202

Is employed as a nurse at MCSO

YES! the defendant was acting under the Authority  
of color of the state law at the time.  
Ms. Grady is one of the Charge Nurses.  
In her individual capacity

7. Name of Defendant: Nurse More  
Address: 700 East Fourth St.  
Charlotte, N.C. 28202

Is employed as a nurse at MCSO

YES! the defendant was acting under the Authority  
of color of the state law at the time.  
In her individual capacity

Ms. More is one of the nursing staff. In her

8. Name of Defendant: Officer Hassaan  
Address: 700 East Fourth St.  
Charlotte, N.C. 28202

Is employed as an Officer at MCSO

YES! the defendant was acting under the Authority  
of color of the state law at the time.

Mr. Hassaan is an P.O. officer.  
In his individual capacity



## B. PARTIES

9. Name of Defendant;  
Address;

Nurse Ford  
700 East Fourth St.  
Charlotte N.C. 28202

Is employed as a Nurse at MCSO

YES!, the defendant was acting under the Authority  
of color of state law at the time.

Ms. Ford is one of the Nursing staff  
In her individual capacity

10. Name of Defendant; Nurse ICE  
Address;

700 East Fourth St.  
Charlotte N.C. 28202

Is employed as a Nurse at MCSO

YES!, the defendant was acting under the Authority  
of color of State law at the time.

Ms. ICE is the infirmary Nurse.  
In her individual capacity

11. Name of Defendant;  
Address;

Nurse Ingrame  
700 East Fourth St.  
Charlotte N.C. 28202

Is employed as a Nurse at MCSO

YES!, the defendant was acting under the Authority  
of color of State law at the time.

Ms. Ingrame is a Charge Nurse.  
In her individual capacity

12. Name of Defendant;  
Address;

Transport Officer Jhonson  
700 East Fourth St.  
Charlotte, N.C. 28202

Is employed as a Transport officer (T/O) at MCSO

YES!, the defendant was acting under the Authority  
of color of State law at the time.

Ms. Jhonson is a Transport officer.  
In her individual capacity



## C. NATURE OF CASE

Nurse Jones and Black refused to give me medical care by refusing to address my sick call's. Dr. Romash and Nurse INGRADE refused to treat my symptoms as I addressed them. Not given me the standard of care for my condition. Each of them knowingly violated my 8th Amendment right to get medical care.

Nurse's Grady, More, Ford, ICE along with Officers, Johnson and Hassan violated my Hippa right to privacy. Therefore each defendant will be sued in their individual capacity.



#### D. CAUSE OF ACTION

I allege that my constitutional rights, privileges or immunities have been violated and that the following facts form the basis for my allegations: (If necessary you may attach additional pages)

Amendment IV, V, VIII and XIV. Unconstitutionally Inadequate Medical Care, deliberate indifference, Hippa law, Right to

- a. (1) Count 1: privilege, failure to protect, jail conditions.  
(2) Supporting Facts: (Describe exactly what each defendant did or did not do. State the facts clearly in your own words without citing any legal authority. Use additional sheets if necessary.)

On June 15th I was experiencing a feeling as if something was shooting under my skin almost like the needle of a TB test. I put in sick call # 2690665 stating something was crawling under my skin. I was called to the appointment the 16th

- b. (1) Count 2: Amendment IV, V, VIII and XIV Hippa violation  
(2) Supporting Facts: (Describe exactly what each defendant did or did not do. State the facts clearly in your own words without citing any legal authority. Use additional sheets if necessary.)

October 17th I was taken to the Dermatology's by transport officer (T/O) Johnson. Upon my return T/O Johnson gave nurse Grady the medical disposition from the dermatology's. She opened it and abruptly YELLED OUT "YOU GOT IT!" drawing the attention

#### E. INJURY

How have you been injured by the actions of the defendant(s)?

I sustained physical injuries do to the migt's. I suffer from anxiety, depression, mental anguish, pain and suffering, mental duress and panic attacks. Also physical and mental damage, defamation, threatens and harassmet.



F. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

Have you filed other lawsuits in state or federal court that deal with the same facts that are involved in this action? YES \_\_\_\_\_ NO ✓

If your answer is "YES", describe each lawsuit. (If there is more than one lawsuit, describe additional lawsuits on additional separate pages, using the same outline.)

1. Parties to previous lawsuits:

Plaintiff(s): \_\_\_\_\_

Defendants(s): \_\_\_\_\_

2. Name of court and case or docket number:

3. Disposition (for example, was the case dismissed? Was it appealed? Is it still pending?)

4. Issues raised:

5. When did you file the lawsuit? \_\_\_\_\_  
Date: Month/Year

6. When was it (will it be) decided? \_\_\_\_\_

Have you previously sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in Part D? YES \_\_\_\_\_ NO \_\_\_\_\_

If your answer is "YES" briefly describe how relief was sought and the results. If your answer is "NO" explain why administrative relief was not sought.



## D. CAUSE OF ACTION

Count #1:

Which was the next day I informed Nurse Jones of how I was feeling I pointed out some hive type bumps in the pits of my arms in the joints of my legs and arms then informed her that the same type bumps were in my front and back private areas. I told her that the itching feeling became worse at night, all over my body but mostly my head and face. Nurse Jones said it was a rash and gave me 25ma Hydrocortisone cream 5%. I told her it was more than a rash and I thought I had some type of skin might. She laughed stating I was crazy and refused to give me any further treatment. Me being in dire need of relief I took the cream, and she told me that if it didn't do anything to put in a follow up sick call. I used the cream as directed until it ran out which was 3 days I found no relief in the cream. So June 22nd 2024 I put in my first follow up sick call #1693254 which informed the Sick call Screening Staff that the cream didn't work. The response: "You got cream less than a week ago what dose patient use at home for skin. One day between the 24th through the 28th I was called to Clinice B (the same place where Sick call appointments are conducted) to see the Mental Health provider. I seen Nurse Jones and stated: "I know that was you that responded to my Sick call that was not funny." She stated: "How did you know" laughing then went on to say: "Boy it aint nothing wrong with you with your crazy self go on in there to see Mental Health." I told her, "the only thing wrong with me is this itching, it feels like bugs on me are you going set me an appointment to see the provider." She said: "Yes" I gave it some time but she never set the appointment. So on July 1st 2024 I put in Sick call #1696939 and requested to see the Doctor. Nurse Black asked which Doctor I was referring to Medical or Mental Health. On July 2nd I put in Sick call #1697331 stating the medical Doctor. Nurse Black asked "What is you need." Me being pissed off because I know all of my sick call request are right there on the screen he's looking at I gave it some time. July 13th Sick call #1701933 I requested to be tested for parasites. Nurse Black responded: "We don't perform random test with out showing symptoms. July 14 I put sick call #1702390 telling them that I have infact shown Nurse Jones the symptoms!" He stated: "will consult with provider."



I waited to see the outcome. Almost 30 days after I seen that I was being refused adequate medical care and the Sick call staff was in fact violating my 8th Amendment right to medical care. I wrote my first Grievance #1737516 on September 9th 2024. On the 12th I put in another Sick call # 1738713 re-requesting a testing for parasites Nurse Jones once again knowing that I am addressing a serious issue and failed to provide me with any type of treatment. She responded by asking me what kind. So me being in serious need of aid I put in Sick call # 1739576 on Sep. 14th requesting once again to be tested for Scabies. Nurse Jones once again playing a game asked me what I used to condition my skin and scalp. Therefor I filed my 2ed grievance on the 15th of Sep. # 1740054. I put in yet another Sick call # 1740208 on the 16th informing staff that Sick call # 1739576 was not about what I used to moisturize my skin with. That day an appointment was made. I was seen by Nurse Ford on the 20th she told me that she would add me on to see the provider the next week. The 25th I went to see Dr. Romash. I informed her of my symptoms even showed her infected areas and requested to be tested for scabies. The first thing she said was I don't see anything wrong, but I don't know about you people's skin. Which really pissed me off. So I asked her why did she become a Doctor to help people right? She said yes. I went on to state you did know that one day you would have to work on, as you said, Doc... "YOU PEOPLE" one day right? I could see the impact of the statement hitting home and she began to apologize at once. Which I quickly dismissed and got back to the topic at hand. I requested a skin test. She told me that she did not have the equipment to do the test and said she will give me T-acl and Hydrocortisone 25% and do to me being in full restraints officer was called into remove them. So I could show Dr. Romash my legs and feet she said she didn't think it was scabies. I said your quest could be wrong could you give me the standard of for the condition which the symptoms point to. I ask her, as a Doctor is it you job to prevent the spread of infectious disease, so for you to act as if you can't see all the symptoms of scabies then your setting yourself up for a class action claim. She said she had been a Doctor for over 20 years and if I had scabies I couldn't sit there I would be jumping around scratching. I said Doctors



misdiagnosis people all the time the officer agreed. Nurse Smith hearing the situation becoming out of hand stepped into the room. Dr. Romash gave her the orders as the officer replaced the full restraints before we stepped out of the room and Nurse Smith went to retrieve the items. Dr. Romash started to talk to Charge Nurse Ingrame about my situation whom began yelling at me as if she wanted to jump on me. Stating Dr. Romash has been doing this over 20 years she knows what she is doing I have over 16 years. I even worked in the ER and have seen a number of scabies cases you don't have that you may have some mental health issues on the other hand then walked off about this time Nurse Smith came back and began to gaggle all the symptoms that I stated and began informing Dr. Romash that the symptoms matched up to what I was saying and told her that she may want to take my situation more serious, but Dr. Romash cut her off and said let him use the items that I gave him for now he will be back in two weeks. October 8th 2024 I filed yet another sick call # 1749372 stating that there was no change in my condition I was then informed of the appointment to see the dermatology's. I went to medical on the 14th and was told about the appointment in person.

## Count # 2;

of Officers, Inmates and Nursing Staff. Nurse More ran to Nurse Grady's side to read the forms, Nurse Ford yelled out "HE GOT WHAT" Laughing. A unknown nurse sitting behind me to my left jokingly yelled out HERPES. Nurse Smith ran out of her work station to see what was going on as well as Dr. Romash at this time Nurse Grady was acting as if she was scratching at her left arm, then stated you got scabies. T/O Johnson yells "I got to tell Sgt. Siver this the left, I was so humiliated. I was placed in a holding cell and told that I would be took to the infirmary so the scabies wouldn't be spread. I said it's a bit late for that one, I've been around a number of people in the past 5 months. When T/O Johnson returned she had on a full protective med suit. It was done more so for show rather than to protect her from anything hell she's been with me all day without it even had to rap her arms around me to put on the full restraints and to take them off. She walked me down the hall. TRU Officer's Huff, Bartholomew and other unknown TRU Officers were on the way towards us TRU



Officer Huff asked T/O Johnson what was wrong. T/O Johnson loudly stated He Got Scabies move out the way. Which sent the band of TRU Officer's running the other way. When I got into the infirmary Office Baker tried to put me into a cell that was unclean. therefore I refused to go into the cell until it was cleaned out. I informed them that this is how I contracted scabies in the first place it is the duty of the Jail staff to maintain the upkeep of the Jail and protect the inmates from these types of out breaks. At this time TRU Officer Smith, dressed in the same Med Suit as T/O Johnson (Mind you when I walked into the infirmary there was a number of inmates already in there standing by the entrance about 5 or 6 guys. Nurse ICE told them to move out the way This guy has Scabies.) I addressed the situation to him. He stated that I was right and asked the guys from Spanderler to spray the cell down. I took this time to ask TRU Officer Smith why he had on the med suit. He told me that I was the talk of the Jail. He said Crittington I fuck's with you but not that much. I can't take that scabies shit home to my wife. At this time Sgt. Wright came with a bed roll. She said T/O Johnson told me about your situation I got you new sheets. A UNKown Sergeant came to my cell door after the cell had been cleaned. He told that he respected what I was saying but it kind of defeat's the purpose seeing that I already got it. The Nurse said you will come out of here tomorrow after you have used the Cream and washed it off. I asked him who told him that and why are they telling you my Medical history. He nodded to nurse ICE when he walked off. Nurse ICE (trying to be funny I guess.) sprayed the Sergeant down with a unknown spray. Capt. McFarly came to address the cell situation. He stated man why are you are you trying to pass that stuff around. I asked him why he didn't do that 5 months ago before I got it. He just walked off. Nurse ICE again with the spray. This is Grievance # 1754471 which was wrote on Oct. 21 2024 along with Grievance # 1754493. which took place in pod 5800 at the same time that I was being placed in the infirmary. Office Hassan whom was working the pod. Told the inmates that I had Scabies which weppenized the inmates against me. When I returned to the pod the Next Day which was the 18th a number of Inmate's came to me with threats of causing me harm and wanting to fight me.



G. REQUEST FOR RELIEF

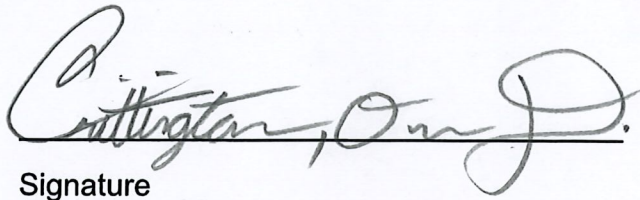
I believe I am entitled to the following relief:

Each defendant excluding Mr. McFadden are being sued in there individual capacity for the sum of \$90 million in damages. I am still seeking medical treatment for the migh'ts because the permethrin cream did not work and I am requesting that each inmate I've been housed with get treatment as well.

JURY TRIAL REQUESTED

YES ☒ NO ☐

Signed at MCSO pod 6900 cell 20 on 2024 December 12.  
(Location) (Date)

  
Signature

Address:

P.O. Box 31367  
Charlotte, N.C. 28234

Phone:

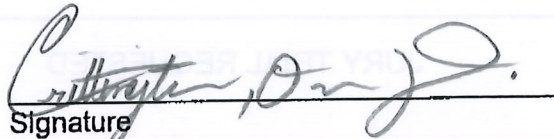
E-Mail:

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was mailed/ delivered to the following individuals at the addresses listed:

I declare under penalty of perjury that the information contained  
in this statement is true and accurate to the best of my  
knowledge. I also declare under penalty of perjury that a copy  
of this document was mailed to...  
CLERK OF COURT; Room 210, 401 W. Trade St. Charlotte, NC.  
28202, and  
J. George Guise Counsel for the MCSO at address  
801 East Fourth St. Charlotte N.C. 28202

This the 31 day of December, 2024.

  
Signature

Omar D. Crittington  
(Print Name)